

Name and address:

#867

Christopher R. Pitoun (SBN 290235)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
301 N. Lake Avenue, Suite 920  
Pasadena, California 91101

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

N.Z., R.M., B.L., S.M. and A.L.

Plaintiff(s),

CASE NUMBER

8:24-cv-01655-FWS-SSC

v.

Fenix International Limited, et al.

Defendant(s),

APPLICATION OF NON-RESIDENT ATTORNEY  
TO APPEAR IN A SPECIFIC CASE  
PRO HAC VICE

**INSTRUCTIONS FOR APPLICANTS**

- (1) The attorney seeking to appear pro hac vice must complete Section I of this Application, the certification in Section II, and have the designated Local Counsel sign in Section III. Space to supplement responses is provided in Section IV. The applicant must also attach a Certificate of Good Standing (issued within the last 30 days) from every state bar to which he or she is admitted; failure to do so will be grounds for denying the Application. Scan the completed Application, together with any attachment(s), to a single Portable Document Format (PDF) file.
- (2) Have the designated Local Counsel file the Application electronically using the Court's electronic filing system ("Motions and Related Filings => Applications/Ex Parte Applications/Motions/Petitions/Requests => Appear Pro Hac Vice (G-64)"), attach a Proposed Order (using Form G-64 ORDER, available from the Court's website), and pay the required \$500 fee online at the time of filing (using a credit card). The fee is required for each case in which the applicant files an Application. Failure to pay the fee at the time of filing will be grounds for denying the Application. **Out-of-state federal government attorneys are not required to pay the \$500 fee.** (Certain attorneys for the United States are also exempt from the requirement of applying for pro hac vice status. See L.R. 83-2.1.4.) A copy of the G-64 ORDER in Word or WordPerfect format must be emailed to the generic chambers email address. L.R. 5-4.4.2.

**SECTION I - INFORMATION**

Vernon, Keith T.

Applicant's Name (Last Name, First Name &amp; Middle Initial)

check here if federal government attorney ☐

Timoney Knox LLP

Firm/Agency Name

1717 K Street NW

202-349-9864

215-540-2643

Suite 900

Telephone Number

Fax Number

Street Address

Washington, DC 20006

kvernon@timoneyknox.com

City, State, Zip Code

E-mail Address

**I have been retained to represent the following parties:**

N.Z., R.M., B.L., S.M. and A.L.

☒ Plaintiff(s) ☐ Defendant(s) ☐ Other: \_\_\_\_\_☐ Plaintiff(s) ☐ Defendant(s) ☐ Other: \_\_\_\_\_

Name(s) of Party(ies) Represented

List all state and federal courts (including appellate courts) to which the applicant has been admitted, and provide the current status of his or her membership. Use Section IV if more room is needed, or to provide additional information.

<u>Name of Court</u>	<u>Date of Admission</u>	<u>Active Member in Good Standing? (if not, please explain)</u>
District of Columbia	11/04/2003	Yes
U.S. District Court for the District of Ohio	10/17/1997	Yes
Supreme Court of Ohio	11/14/1996	Good standing & Non-active since 2018.

List all cases in which the applicant has applied to this Court for *pro hac vice* status in the previous three years (continue in Section IV if needed):

<u>Case Number</u>	<u>Title of Action</u>	<u>Date of Application</u>	<u>Granted / Denied?</u>
N/A			

If any *pro hac vice* applications submitted within the past three (3) years have been denied by the Court, please explain:

*Attorneys must be registered for the Court's electronic filing system to practice pro hac vice in this Court. Submission of this Application will constitute your registration (or re-registration) to use that system. If the Court signs an Order granting your Application, visit [www.pacer.gov](http://www.pacer.gov) to complete the registration process and activate your e-filing privileges in the Central District of California.*

## SECTION II - CERTIFICATION

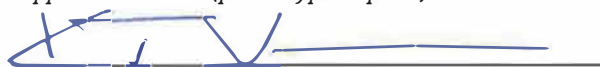
I declare under penalty of perjury that:

- (1) All of the above information is true and correct.
- (2) I am not a resident of the State of California. I am not regularly employed in, or engaged in substantial business, professional, or other activities in the State of California.
- (3) I am not currently suspended from and have never been disbarred from practice in any court.
- (4) I am familiar with the Court's Local Civil and Criminal Rules, the Federal Rules of Civil and Criminal Procedure, and the Federal Rules of Evidence.
- (5) I designate the attorney listed in Section III below, who is a member in good standing of the Bar of this Court and maintains an office in the Central District of California for the practice of law, in which the attorney is physically present on a regular basis to conduct business, as local counsel pursuant to Local Rule 83-2.1.3.4.

Dated 12/04/2024

Keith T. Vernon

*Applicant's Name (please type or print)*

  
*Applicant's Signature*

**SECTION III - DESIGNATION OF LOCAL COUNSEL**

Pitoun, Christopher R.

*Designee's Name (Last Name, First Name & Middle Initial)*

Hagens Berman Sobol Shapiro LLP

*Firm/Agency Name*

301 N Lake Avenue

213-330-7150

213-330-7152

Suite 920

*Telephone Number*

*Fax Number*

*Street Address*

christopherp@hbsslaw.com

Pasadena, CA 91101

*Email Address*

*City, State, Zip Code*

290235

*Designee's California State Bar Number*

I hereby consent to the foregoing designation as local counsel, and declare under penalty of perjury that I maintain an office in the Central District of California for the practice of law, in which I am physically present on a regular basis to conduct business.

Dated 12/16/24

Christopher Pitoun  
*Designee's Name (please type or print)*

[Signature]  
*Designee's Signature*

**SECTION IV - SUPPLEMENT ANSWERS HERE (ATTACH ADDITIONAL PAGES IF NECESSARY)**



*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,  
the District of Columbia Bar does hereby certify that*

***Keith T Vernon***

*was duly qualified and admitted on November 14, 2003 as an attorney and counselor entitled to  
practice before this Court; and is, on the date indicated below, an Active member in good  
standing of this Bar.*

*In Testimony Whereof,  
I have hereunto subscribed my  
name and affixed the seal of this  
Court at the City of  
Washington, D.C., on December 17, 2024.*

*Julio A. Castillo*  
**JULIO A. CASTILLO**  
Clerk of the Court

Issued By:

A handwritten signature in black ink, appearing to read "David Chu".

*David Chu - Director, Membership  
District of Columbia Bar Membership*

***For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email  
memberservices@dcbbar.org.***



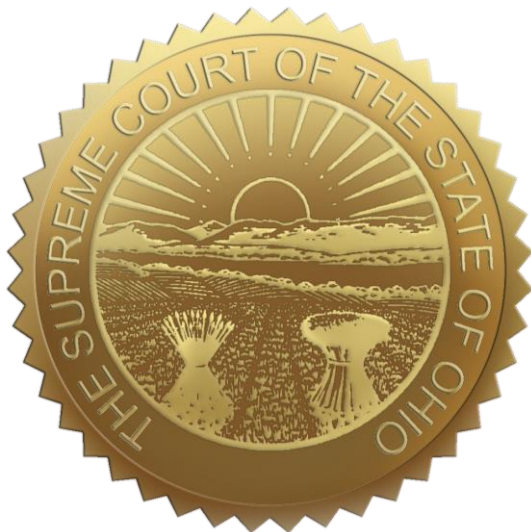
# THE SUPREME COURT *of* OHIO

## CERTIFICATE OF GOOD STANDING

I, MICHEL JENDRETZKY, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,


**Keith Thomas Vernon**  
Attorney Registration No. **0067337**

was admitted to the practice of law in Ohio on November 14, 1996; is in good standing with the Supreme Court of Ohio; but has registered as an inactive attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio and, therefore, is not currently entitled to practice law in this state. An attorney may request a change of status from inactive to active by filing a new certificate of registration and paying the registration fee.



IN TESTIMONY WHEREOF, I have  
subscribed my name and affixed the seal of  
the Supreme Court, this 17th day of  
December, 2024.

MICHEL JENDRETZKY  
*Director, Attorney Services Division*

  
Kirstyn Moyers, *Attorney Services Manager*  
*Office of Attorney Services*



No. 2024-12-17-1

Verify by email at [GoodStandingRequests@sc.ohio.gov](mailto:GoodStandingRequests@sc.ohio.gov)